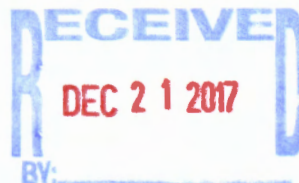




The Simon Law Firm, P.C.
Attorneys and Counselors at Law

December 11, 2017

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460



Re: FOIA Request

Dear Sir/Madam:

This letter is a formal request for the release of documents under the Freedom of Information Act (FOIA). The information requested concerns all documents and written information received by, created by or disseminated by the U.S. Environmental Protection Agency ("EPA") relating to e-cigarettes, lithium ion batteries from 2000 through the present date.

I am also requesting any and all documents pertaining to the following:

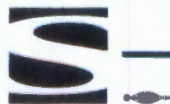
1. All documents in EPA's possession which list or describe the types of lithium ion batteries designed, manufactured, or distributed by LG Chemical America, Inc., LG Chem Ltd., LG Chem Michigan Inc., LG Chem Power Inc., or any other LG parent, subsidiary, or affiliate in the United States;
2. Any and all documents that relate to or discuss the dangers posed by lithium ion batteries, including the risk of explosion;
3. Any and all documents that relate to or discuss the dangers posed by electronic cigarettes ("e-cigs"), including the risk of explosion.
4. Any and all documents related to any testing that is performed on, that should be performed on, or that is required to be performed on lithium ion batteries prior to their sale to the public;
5. Any and all documents related to any testing that is performed on, that should be performed on, or that is required to be performed on e-cigs prior to their sale to the public;
6. Any and all studies, research papers, memoranda, industry literature, publications, PowerPoint presentations or articles regarding the dangers posed by lithium ion batteries, including the risk of explosion.

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7. Any and all studies, research papers, memoranda, industry literature, publications, PowerPoint presentations or articles regarding the dangers posed by e-cigs, including the risk of explosion.
8. All communications between the EPA and LG Chemical America, Inc., LG Chem Ltd., LG Chem Michigan Inc., LG Chem Power Inc., or any other LG parent, subsidiary, or affiliate related to the dangers or risks associated with lithium ion batteries, including the danger and risk of explosion.
9. Any and all documents concerning the design of lithium ion batteries, including any patents, design drawings, specification sheets, manuals, engineering reports, or other documents that purport to explain the design of lithium ion batteries.
10. Any and all documents concerning the design of lithium ion batteries, including any patents, design drawings, specification sheets, manuals, engineering reports, or other documents that purport to explain the design of e-cigs.
11. All photographs, videotapes, surveillance in EPA's possession depicting the explosion of a lithium ion battery and/or e-cig.
12. All complaints, claims, lawsuits, reports, notices, writings, allegations, or any information of any kind received by EPA related to any incidents of alleged injury due to the explosion of lithium ion batteries and/or e-cig, including all models and any lithium ion batteries designed, manufactured and/or sold by LG Chemical America, Inc., LG Chem Ltd., LG Chem Michigan Inc., LG Chem Power Inc., or any other LG parent, subsidiary, or affiliate.
13. All consumer reported incidents related to the explosion of lithium ion batteries and/or e-cig;
14. All epidemiological investigation reports, including in-depth investigation reports, related to the design, manufacture, and/or distribution of lithium ion batteries and/or e-cigs.
15. All documents generated as a result of EPA's investigation into the dangers or risks associated with lithium ion batteries over the past 10 years.
16. All documents generated as a result of EPA's investigation into the dangers or risks associated with e-cigs over the past 10 years.
17. All manufacturer investigative files related to lithium ion batteries designed, manufactured, or distributed by LG Chemical America, Inc., LG Chem Ltd., LG Chem Michigan Inc., LG Chem Power Inc., or any other LG parent, subsidiary, or affiliate;
18. All documents related to any recall, or proposed recall, of lithium ion batteries, including but not limited to lithium ion batteries designed, manufactured, or distributed by LG

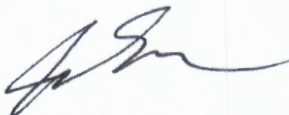


Chemical America, Inc., LG Chem Ltd., LG Chem Michigan Inc., LG Chem Power Inc., or any other LG parent, subsidiary, or affiliate.

19. All written information, including press releases, open letters, warnings, alerts, safety publications issued by EPA related to the dangers or risks associated with lithium ion batteries.
20. A full and complete copy of any laws, regulations, codes, standards, or guidelines proposed, enforced or issued by EPA related to the design, manufacture, distribution, or risks associated with lithium ion batteries.
21. All documents discussing, explaining, or outline any regulatory requirements applicable to lithium ion batteries, including warning labels, instructions, formal or voluntary standards, formal or informal guidance;

I request that these documents be certified and bates-stamped. In addition, I request that these documents be organized per request. I understand that there will be a fee associated with this request. Please notify me if prepayment is required. Thank you for your cooperation and if there are any questions or concerns, please do not hesitate to contact me.

Very truly yours,



John M. Simon
Attorney at Law

JMS/skz





The Simon Law Firm, P.C.
Attorneys and Counselors at Law

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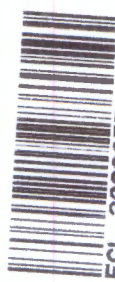
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